

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 18-16902-elf
Rahsaan G Thomas	:	Chapter 13
	:	Judge Eric L. Frank
Debtor(s)	:	*****
	:	
Wells Fargo Bank, N.A	:	Date and Time of Hearing
	:	Place of Hearing
vs	:	March 12, 2019 at 9:30 a.m.
	:	
Rahsaan G Thomas	:	U.S. Bankruptcy Court
Sade Thomas	:	900 Market Street, Courtroom #1
	:	Philadelphia, PA, 19107
William C. Miller, Esq.	:	
Respondents.	:	

CERTIFICATION OF NO OBJECTION REGARDING
MOTION FOR RELIEF FROM THE AUTOMATIC STAY TO PERMIT WELLS
FARGO BANK, N.A TO FORECLOSE ON 37 WEST WYNEVA STREET,
PHILADELPHIA, PA 19144 (DOCUMENT NO. 20)

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion for Relief from the Automatic Stay ("Motion") filed on February 13, 2019 at Document No. 20 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than February 28, 2019.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

/s/ Karina Velter
Karina Velter, Esquire (94781)
Adam B. Hall (323867)
Sarah E. Barngrover (323972)
Manley Deas Kochalski LLC

P.O. Box 165028
Columbus, OH 43216-5028
Telephone: 614-220-5611
Fax: 614-627-8181
Attorneys for Creditor
The case attorney for this file is Karina
Velter.
Contact email is kvelter@manleydeas.com

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Respondents.		

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Certification of No Objection Regarding Motion for Relief from Co-Debtor Stay with 30 day waiver with the Court to permit Wells Fargo Bank, N.A to foreclose on 37 West Wyneva Street, Philadelphia, PA 19144 was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,
Philadelphia, PA 19107

William C. Miller, Esq., Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

David M. Offen, Attorney for Rahsaan G Thomas, The Curtis Center, 601 Walnut Street,
Suite 160 West, Philadelphia, PA 19106, dmo160west@gmail.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on March 5,
2019:

Rahsaan G Thomas, 37 W. Wyneva Street, Philadelphia, PA 19144

Rahsaan Thomas and Sade Thomas, 37 West Wyneva Street, Philadelphia, PA 19144

DATE: 3/5/19

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

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Attorneys for Creditor

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